

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
5 POST OFFICE SQUARE, BOSTON, MA 02109-3912**

MEMORANDUM

DATE: January 16, 2015

SUBJ: Inspection Report: TSCA Sections 402(c) Compliance Inspection of T and T Complete Landscaping, LLC of Newington, Connecticut

FROM: Alexander Aman
Toxics and Pesticides Unit, US EPA R1

THRU: Stephanie Carr, Senior Enforcement Coordinator
Toxics and Pesticides Unit, US EPA R1

TO: File

I. General Information

- A. Firm and Address:
T and T Complete Landscaping, LLC
David Tremblay, Owner
30 A Spring Street
Newington, Connecticut
- B. Location of Inspection:
30 A Spring Street
Newington, Connecticut
- C. Date of Inspection: April 10, 2014
- D. Personnel Participating in Inspection (name, title, affiliation):

Alexander Aman, Toxics and Pesticides Unit, US EPA R1
Molly Magoon, Toxics and Pesticides Unit, US EPA R1

II. Purpose of Inspection and Background Information

- A. How was Firm Selected/ Objectives of Inspection:

Referral from CT DPH. See attached. The complaint was referred by EPA OES to CID which conducted follow-up activities and then referred it back to OES for civil investigation.

B. Background Information on Firm:

T and T Complete Landscaping, LLC (T and T) is a landscaping company based out of Newington, Connecticut. T and T owner David Tremblay stated that his company has a number of seasonal employees which rotate in and out based on available work. Mr. Tremblay also stated that T and T performs landscaping, power washing, and deck replacement activities and the the painting activities identified in the complaint were there first T and T performed.

C. Account of Pre-Inspection Communications with Firm:

Limited to NOI. See Attached.

III. Inspection Time and Paperwork

A. Start Time: 11:00 am

B. End Time: 1:15 pm

C. EPA Inspector Credential Presented: Yes____ to the following company representative(s)

Name: David Tremblay

Title: Owner

Name: David Thibodaux

Title: Employee

Name_____ Title_____

D. Forms (Check those signed and if attached. If not signed, add brief explanation as to why.):

1. Notice of Inspection Form: signed (yes__X__no____) attached(yes_X__no____)
2. TSCA Confidentiality Form: signed (yes__X__no____) attached(yes_X__no____)
3. Receipt for Documents Form: signed (yes__X__no____) attached(yes_X__no____)

IV. RRP Rule Inspection

A. Had entity heard of the RRP Rule? Yes__X__No_____ How?

David Tremblay stated that T and T had not heard about the RRP Rule prior to the incident in the complaint.

B. Did entity have EPA RRP Firm Certification? Yes_____No___X___

If "Yes", is certificate attached? Yes_____No___X___

C. Did entity have Certified Renovators on staff? Yes_____No___X___

If yes, include names and roles, if appropriate and note if certificates are attached.

Name_____Role_____certificate attached (Yes___No___)

Name_____Role_____certificate attached (Yes___No___)

D. Does entity have a system of keeping records of RRP Compliance for subject jobs? (If so, describe)

Yes. T and T generally keeps job specific files with scope of work descriptions.

However the job identified in the complaint was had a verbal contract because Mr. Tremblay stated that he was friends with the property owner.

E. Did entity perform jobs subject to RRP Rule?

Yes ___X___ If "yes", complete subsequent pages of form, if applicable

No _____If "no", briefly explain why work entity performed is not subject to the RRP Rule.

Please complete the rest of this page only (through Section V) and include this memo with documents and forms collected at the inspection and file in OES Record Center.

F. Was inspection a...

1. work practice inspection? Yes_____No___X___ If "Yes," please complete only the rest of this page (through Section V) and attach at least one of the following.

a. Checklist attached? Yes___No___

b. Field notes attached? Yes___No___

c. Narrative of work practice inspection attached? Yes___No___

2. records inspection? Yes_X___No____. If "Yes," please complete subsequent sections as necessary to document the inspection.

V. Compliance Assistance

What compliance assistance was provided?

Extensive compliance assistance was provided detailing record keeping requirements, documentation and testing requirements for lead free determinations, minor repair and maintenance activities, and firm and renovator certifications.